



28 September 2009

Boards Support Section  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, AK 99811-5526  
Delivered via Fax: 907-465-6094

**RE: 2009/2010 ACR Submission Comments**

Dear Chairman Jensen & Board Members,  
SEAGO represents a comprehensive group of charter fishing operators, lodge owners, and our clients. Our mission is to promote the tradition of sport fishing in Southeast Alaska through reasonable regulations that ensure the long-term sustainability of our businesses and fisheries. Sportfishing in Southeast hosts 100,000 anglers and creates \$300M income and 3,000+ jobs annually.

We are commenting on proposals (see below) that either directly affect our industry or the overall health of the resource. We urge the Board of Fisheries to continue its longstanding practice of considering proposals based on sound science and data collection and analysis. This includes work done by ADF&G, NMFS, and the Alaska State Troopers Wildlife Enforcement Division, among others.

We would sincerely appreciate your help in giving fair and balanced guidance to the ADF&G mission by ensuring our fisheries continue to be available to the thousands of sport and guided sport anglers who are good stewards of the resource and contribute billions of dollars to our economy. It is important to fully understand the economic values and the business models that distinguish each user group and to craft policies that optimize the value of Alaska's resources for the greater good. The Board of Fisheries has SEAGO's pledge to work constructively to that end.

Thank you for taking our comments into consideration.

Sincerely,

John A. Blair  
Executive Director  
925-366-6638  
[john@seagoalaska.org](mailto:john@seagoalaska.org)

//attach



### Attachment - 2009/2010 ACR Submission Comments

SEAGO offers the following summary comments below. In addition we may wish to provide additional information via public testimony and Recorded Comments during the BOF meeting in Anchorage in October, 2009.

Proposal  
**ACR #4**

Recommendation

**OPPOSE.**

*Synchronize sport bag limit and commercial quota changes for sablefish in Northern Southeast District. (5 AAC 47.020)*

Sablefish quotas have been already addressed twice in 2009, first at the February BOF meeting in Sitka, and then again at the March BOF meeting and follow-up conference call in April. Through this process, the BOF established extremely conservative sport fish harvest regulations for the first time.

This ACR request should be not allowed for two primary reasons:

1. The ACR request is specifically contrary to BOF policy for submission in that it is allocative in nature and provides no new information on sport catch of sablefish,(see Item # 2 in ACR POLICY FOR CHANGING BOARD OF FISHERIES AGENDA - 5 AAC 39.999. POLICY FOR CHANGING BOARD AGENDA).
2. 2009 is the first year that sablefish data is being collected for sport fish sector. To-date no data have been published by ADF&G. Further, sportfishing representatives have previously testified that the our catch of sablefish are less than 1% of the total catch and has a de minimus impact on this fishery.

The type of management proposed by the commercial fishing authors is usually only appropriate when there is a hard allocation on the user group affected by the proposed regulation. There is no such hard cap at this time and no data to establish one.

We recommend that no further action be taken on sport allocation of sablefish until adequate data on catch rates are accumulated.

**ACR #8**

**OPPOSE.**

*Close specific areas to guided sport fishing for rockfish in Juneau-Douglas area. (5 AAC 47.021)*

SEAGO opposes this proposal as being selectively punitive towards sportfishers. If a closure is warranted, it must be for all user groups.

The ACR doesn't meet the criteria for an out of cycle regulation change. This request is based on anecdotal speculation and no hard data are provided to demonstrate that the charter fleet is either targeting rockfish outside of its allocation or having a significant impact on the rockfish population. Finally, for all practical purposes, the group cited in the ACR request (ie, cruise related charters), have ended for this the year so time is available to collect actual logbook data on catch rates. Decisions can then be made based on actual data.